

Planning Policy Consultation Team
Department for Communities and Local Government
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02 May 2017

Dear Sir / Madam,

Consultation on new permitted development rights¹

Thank you for the opportunity to comment on this consultation.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (CIIfA) is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provide a self-regulatory quality assurance framework for the sector and those it serves.

CIIfA has over 3,200 members and around 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

Rural development and agricultural permitted development rights

General

CIIfA (together with the Council for British Archaeology and the Association of Local Government Archaeological Officers for England) submitted evidence to the Rural Planning Review on the 19th April 2016 in which the three bodies expressed concerns about the impact of extending permitted development rights on the historic environment and in particular upon heritage assets with archaeological interest. Those concerns remain and CIIfA urges Government to address these issues in framing any further revisions of the Town and Country Planning (General Permitted Development) (England) Order 2015.

The response to all other issues raised in relation to the Housing White Paper is dealt with under separate cover.

Specific Questions

Question: Should the thresholds set out in Part 6, Class A of the Town and Country (General Permitted Development) Order 2015 (as amended) be amended, and if so:

- **What would be appropriate thresholds including size and height;**
- **What prior approvals or further conditions would be required; and,**
- **Are there other changes in relation to the thresholds that should be considered?**

39.1 Any changes to thresholds, especially in relation to development which involves ground disturbance, should take into account the potential impact of such development upon the historic environment and, in particular, upon buried remains. Ideally, where heritage assets of archaeological interest may be involved (including those which are undesignated), there should be the ability to prevent the exercise of permitted development rights or to impose conditions addressing archaeological issues. These concerns are only partially addressed through the prior approval process.

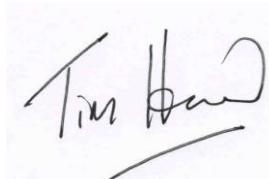
Question: Do you consider that this proposal would be effective in creating more homes for rural workers, and if so:

- **How should the right be framed to best ensure homes are available to meet local need; and,**
- **Should the new right have similar conditions to the existing Class Q right?**

40.1 No comment, save that changes of use (even involving no operational development) can have a significant effect upon the character and setting of heritage assets. Any new permitted development rights should be subject to the same exceptions as those which apply to Part 3 Class Q rights, including exceptions for Article 2(3) land, scheduled monuments and listed buildings.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,



Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor

¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/589763/Summary_of_responses_to_the_technical_planning_consultation.pdf